



CALIFORNIA EMERGENCY MANAGEMENT AGENCY  
LOCAL ASSISTANCE MONITORING BRANCH  
3650 SCHRIEVER AVENUE  
MATHER, CALIFORNIA 95655  
PHONE: (916) 845-8120 FAX: (916) 845-8380

July 23, 2009

Sandy Covall-Alves  
Emergency Services Coordinator  
Sonoma County  
2300 County Center Drive, Suite 221A  
Santa Rosa, California 95403-4107

SUBJECT: COMPLIANCE REVIEW REPORT CLOSURE  
GRANT: FEMA-1155, OES PROJECT #0055, FIPS #097-00000  
PHASED ELEVATION MITIGATION PROJECT

Dear Ms. Covall-Alves:

The California Emergency Management Agency (CalEMA) has received the Sonoma County's Community Development Commission (County) correspondence dated July 13, 2009 submitted in response to CalEMA's July 1, 2009 acceptance of the County's Corrective Action Plan of the above referenced grant.

The County's response included a warrant in the amount of \$327,807.94 covering unexpended funds and earned interest on the above grant. CalEMA accepts the County's corrective actions and considers all findings in the compliance review resolved.

If you have any questions about this letter, please contact Don MacMillan at (916) 845-8107, or by electronic mail at [don.macmillan@oes.ca.gov](mailto:don.macmillan@oes.ca.gov).

Sincerely,

A handwritten signature in cursive script that reads "Catherine Lewis".

CATHERINE LEWIS  
ACTING BRANCH CHIEF

cc: Kathleen H. Kane, Sonoma County CDC Executive Director  
Gary Tabbert, Sonoma County CDC, Project Coordinator  
Peggy Okabayashi, CalEMA Assistant Secretary  
Paul Ransom, CalEMA Hazard Mitigation Branch  
Jorge Hunt, CalEMA Hazard Mitigation Branch  
Subrecipient File



**Sonoma County Community Development Commission**  
Housing Authority • Redevelopment Agency  
1440 Guerneville Road, Santa Rosa, CA 95403-4107

*Members of the  
Commission*

**Paul L. Kelley**  
Chairman

**Valerie Brown**  
Vice Chairwoman

**Mike Kerns**  
**Shirlee Zane**  
**Efren Carrillo**

**Kathleen H. Kane**  
Executive Director

JULY 13, 2009

CALIFORNIA EMERGENCY MANAGEMENT AGENCY  
LOCAL ASSISTANCE MONITORING BRANCH  
ATTN: MICHAEL BALDWIN, BRANCH CHIEF  
3650 SCHRIEVER AVENUE  
MATHER, CALIFORNIA 95655

RE: HMGP DR-1155, OES PROJECT #0055, FIPS #097-00000  
SONOMA COUNTY PHASED ELEVATION MITIGATION PROJECT

Dear Mr. Baldwin;

The elevation program referenced above ended on December 31, 2008. OES staff monitored the program in February 2009 and produced a report sent to the County of Sonoma. The County of Sonoma responded with a letter dated July 1, 2009. Within that letter it was mentioned that a payment was being prepared payable to CalEMA in the amount of \$327,807.94. Please find the related warrant enclosed.

Please call me at (707) 565-7511 if you have any questions about this remittance of interest earned (\$106,030.73) and grant funds returned (\$221,777.21).

Sincerely,

Lawrence M. Cuneo  
Controller  
Sonoma County Community Development Commission

cc via email Sandy Covall-Alves  
Emergency Services Coordinator  
Sonoma County Department of Emergency Services

Catherine Lewis  
Associate Management Auditor  
CalEMA



Telephone (707) 565-7500  
FAX (707) 565-7583 • TDD (707) 565-7555







COUNTY OF SONOMA  
DEPARTMENT OF EMERGENCY SERVICES  
FIRE SERVICES \* EMERGENCY MANAGEMENT \* HAZARDOUS MATERIALS



MARK ASTON, DIRECTOR/FIRE CHIEF

JULY 1, 2009

CALIFORNIA EMERGENCY MANAGEMENT AGENCY  
LOCAL ASSISTANCE MONITORING BRANCH  
ATTN: MICHAEL BALDWIN, BRANCH CHIEF  
3650 SCHRIEVER AVENUE  
MATHER, CALIFORNIA 95655

REC'D  
7/7/09  
Mae

RE: GRANT MONITORING RESPONSE AND CORRECTIVE ACTION PLAN  
HMGP DR-1155, OES PROJECT #0055, FIPS #097-00000  
SONOMA COUNTY PHASED ELEVATION MITIGATION PROJECT

Dear Mr. Baldwin;

The California Emergency Management Agency (CalEMA) conducted a compliance field review of the Sonoma County Phased Elevation Mitigation Project (Program) under DR-1155-55-004 on February 18-19, 2009. A Grant Monitoring Report dated April 6, 2009 (Report), was sent as a result of the field review. An inadvertent delay prevented the program administration staff from receiving the report until May 29, 2009. This letter is in response to that report.

The compliance field review was conducted nearly two months after the December 31, 2008 end date for the DR-1155 funded Program. All elevations had at that time been completed, funds disbursed and program administration staff were in the process of preparing the grant closeout package subsequently submitted to CalEMA and FEMA. The findings and recommendations listed in the Report are addressed in this Corrective Action Plan and discussed in relation to the administration of future FEMA grants under the Flood Mitigation Assistance (FMA) program, the Severe Repetitive Loss (SRL) program or an HMGP program should Sonoma County be allocated such funding in response to a future federally declared disaster. Parameters for each of these programs vary somewhat, but the essence of the concerns expressed in the Report are germane to each program. Policies and procedures to address concerns will be included in a revised flood elevation program design that will be adopted by the Sonoma County Board of Supervisors to comply with these different program regulations within ninety days.

**Finding #1: Subrecipient is not following federal regulations regarding the calculation and reimbursement of eligible program costs.**

Each expenditure and disbursement made in the administration of the Program was fully documented in the project file. Programmatic guidelines ensured that payments were made only for eligible work as specified in the contract documents and only after approval by the local building inspection department. The expense amounts listed in each project's financial tracking sheet are one hundred percent accurate and verifiable.



Housing renovation projects such as structural elevations cannot be undertaken without establishing contingency funding to cover the cost of repairing unseen structural deficiencies, dry rot damage and other potentially dangerous or unstable conditions exposed when an existing structure is detached from its foundation and lifted into the air. The Program guidelines dictate that once fixed price bids are received and other project expenses are known, a minimum of ten percent of that total cost is added to the project cost to address those unforeseen issues that inevitably arise. The owner's matching contribution, a combination of the contingency amount plus any project costs exceeding the grant cap, and the amount of the FEMA grant are calculated at that time. The contingency amount, however, was not fully utilized in some cases. Seventy-three houses were elevated under DR-1155 in two distinct groups. Sixty-two units were completed prior to 12/31/2005 and the final eleven units were elevated after additional funding was allocated by FEMA beginning in mid 2007. CDC staff and construction costs changed substantially in the period between the two groups and the overall economic climate began to change, as well. In response to those changes, a different model for calculating the match amount was developed, but was implemented in a manner that allowed a few of the last eleven individual elevations that did not utilize all of the construction contingency funds to fall short of the twenty-five percent non-federal match level.

The *HMGP Desk Reference*, (<http://www.fema.gov/library/viewRecord.do?id=1472>) Publication FEMA 345, dated October 1999 is the FEMA guidance document applicable to all disasters declared prior to June 1, 2009. *The Cost Sharing and Matching* sub-section of *Section 13: Administrative/Grants Management* describes the twenty-five percent non-federal cost-share on page 13-7 as follows:

*"While the non-Federal match for the HMGP must be at least 25 percent, it is not necessary for the non-Federal match to be 25 percent on every individual project. It is only necessary that the cost-share ratio for the funding of all combined projects for the disaster is at least 25 percent."*

Seventy-three properties were elevated under DR-1155, expending \$3,667,323.79 in federal funds, along with \$2,285,953.61 in non-federal match funds, resulting in a matching contribution ratio of 38.4%. It is clear that the Sonoma County Flood Elevation Program is in full compliance with the FEMA regulations governing HMGP, DR-1155, even though a few of the final projects fell short of the twenty-five percent match amount as noted in the Report. It is the intention of Sonoma County that, moving forward, each and every individual project meet the minimum match requirements of the FMA, SRL or HMGP programs they are funded under. To that end, the match calculation model and implementation procedures used during the final eleven elevations funded under DR-1155 have been modified to ensure that the grant amount and owner contribution amount are recalculated to reflect the final project costs and those figures, rather than the original projections, determine the maximum federal cost share. This revised model and process is being employed in the FMA07 project currently underway and will be used in all future projects.

The DR-1155-funded Flood Elevation Program was closed out as of 12/31/2008. A database was maintained throughout the administration of the Program. All receipts and disbursements related to each individual elevation were tracked with full documentation kept in individual project files. Unexpended DR-1155 grant funds will be returned to CalEMA via a county



warrant within the next seven to ten days. Draw down of grant funds will be done strictly on a reimbursement basis for all future FMA, SRL and HMGP funded elevation projects.

**Finding #2: Subrecipient is not reporting interest earned and payable to grant funding source.**

The Sonoma County Community Development Commission (CDC) maintains a fund accounting system to track all receipts and expenditures. The transactions pertaining to each specific program, including the Flood Elevation Program, are recorded in an individual fund within that fund accounting system. The CDC is audited annually by an independent auditor, and interest payable is an item that is tested during those audits.

The Report notes that the CDC has recognized interest payable to various funding sources. Interest payable, but not associated with loans, is attributed to only two funding sources, totaling \$129,031 as of June 30, 2008. Currently \$106,030.73 of interest payable is due to CalEMA/FEMA. The remainder is due to the City of Rohnert Park.

In addition to interest payable, program funds requested but not used must also be returned. Program funds on hand amount to \$221,777.21. Now that the DR-1155-funded Flood Elevation Program is complete, it is appropriate for the CDC to return the unused program funds and any accumulated interest. A county warrant in the amount of \$327,807.94 is being processed and will be submitted to CalEMA within seven to ten days.

**Advisory Recommendations**

- OMB Circular A-133 requires the CDC to prepare an audit report nine months following the end of the fiscal year. State of California regulations associated with redevelopment agencies requires audit reports to be completed six months after the end of each fiscal year. The Sonoma County Redevelopment Agency is part of the CDC, and therefore, these audit reports are always completed within the six-month time frame. The CDC maintains an audit report distribution list. All agencies on the list receive an audit report. As the CDC learned during the February monitoring visit that, being the agency administering the FEMA-funded hazard mitigation grant programs, submission of the audit reports is required, CalEMA was added to this list. An audit report for the year ending June 30, 2008, was given to the CalEMA monitoring staff while on site. Future audit reports will be forwarded to CalEMA Local Assistance Monitoring Branch, attention Catherine Lewis, or another address if so directed, upon annual availability.
- The Sonoma County Flood Elevation Program was developed in response to the flood events of 1995 and 1997, and was the first of its kind. Many of the program parameters were collaboratively developed by FEMA, California OES and Sonoma County with without the benefit of past experience administering a program of its nature. Many elements were specific to the Sonoma County program. One such element was a pre-determined cap for the grant amount. Limiting the amount of grant funds usable on individual elevation projects often meant that all of the allowable grant funds were disbursed to pay the actual construction contract amount and many other eligible project

expenses, such as design and engineering, and relocation expenses, had to be borne solely by the property owner without the benefit of grant assistance. This is the key reason that the overall non-federal match amount far exceeds the twenty-five percent minimum, and also the reason that the original program design carried the requirement that owner funds be deposited in an escrow account to cover all tenant relocation expenses. However, in practice, the Flood Elevation Program procedures accomplished the relocation requirements without utilizing a specific escrow, and over two hundred properties were elevated with no relocation problems by simply working with the owners to get the relocation adequately accomplished. The escrow requirement, however, was not removed from the program design, resulting in the discrepancy noted in the Report. As has been discussed earlier in this response letter, the DR-1155-funded hazard mitigation program has been closed out for six months. Future flood elevation projects will be undertaken under the FMA and SRL programs. Those programs do not have a grant cap amount. Relocation costs are reimbursable at seventy-five percent (ninety percent in the case of SRL) by the FEMA grant funds. The program design for all elevation projects moving forward will be revised within ninety days to remove the relocation cost escrow requirement, as those expenses will be included directly in the project cost, and will be covered by both FEMA grant funds and the property owners non-federal match funds in the appropriate proportion. As has been the practice since the inception of the program, the property owners will be required to deposit their entire matching fund amount in an escrow account before signing the grant agreement and construction contract.

If you have any questions or require additional information, please do not hesitate to contact Gary Tabbert, Community Development Associate, at (707) 565-7542 or by electronic mail at [gtabbert@sonoma-county.org](mailto:gtabbert@sonoma-county.org).

Respectfully submitted,



Sandy Covall-Alves  
Emergency Services Coordinator  
Sonoma County Department of Emergency Services

cc: Peggy Okabayahi, CalEMA Assistant Secretary  
Catherine Lewis, CalEMA Associate Management Auditor  
Paul Ransom, CalEMA Hazard Mitigation Branch  
Jorge Hunt, CalEMA Hazard Mitigation Branch  
Kathleen H. Kane, CDC Executive Director





**CALIFORNIA EMERGENCY MANAGEMENT AGENCY  
LOCAL ASSISTANCE MONITORING BRANCH  
3650 SCHRIEVER AVENUE  
MATHER, CALIFORNIA 95655  
PHONE: (916) 845-8120 FAX: (916) 845-8380**

July 9, 2009

Sandy Covall-Alves  
Emergency Services Coordinator  
Sonoma County  
2300 County Center Drive, Suite 221A  
Santa Rosa, California 95403-4107

SUBJECT: CORRECTIVE ACTION PLAN ACCEPTANCE  
GRANT: FEMA-1155, OES PROJECT #0055, FIPS #097-00000  
PHASED ELEVATION MITIGATION PROJECT

Dear Ms. Covall-Alves:

The California Emergency Management Agency (CalEMA) formerly the Governor's Office of Emergency Services (OES), has reviewed the Sonoma County's Department of Emergency Services (County) corrective Action Plan (CAP) issued July 1, 2009 submitted in response to CalEMA's April 6, 2009 compliance review report of the above referenced grant.

The County's response indicates the County has taken appropriate action to ensure that all future reimbursement requests will be based on eligible program costs. Also, all interest earned on program funds has been tracked and will be returned to CalEMA. Based on your response neither of these deficiencies should become an issue with any future funding.

CalEMA accepts the County's corrective action plan regarding this finding. However, before CalEMA considers this finding closed you must submit a copy of the county warrant(s) returning both the unexpended DR-1155 grant funds and the accumulated interest. These copies should be submitted to CalEMA, attention Don MacMillan within 30 days from the date of this letter. If you have any questions about this letter, please contact Don MacMillan at (916) 845-8107, or by electronic mail at [don.macmillan@oes.ca.gov](mailto:don.macmillan@oes.ca.gov).

Ms. Sandy Covall-Alves

July 9, 2209

Page 2

Thank you for your diligence in addressing these program deficiencies in a timely and effective manner.

Sincerely,

A handwritten signature in cursive script, appearing to read "Catherine Lewis".

CATHERINE LEWIS  
ACTING BRANCH CHIEF

cc: Kathleen H. Kane, Sonoma County CDC Executive Director  
Gary Tabbert, Sonoma County CDC, Project Coordinator  
Peggy Okabayashi, CalEMA Assistant Secretary  
Paul Ransom, CalEMA Hazard Mitigation Branch  
Jorge Hunt, CalEMA Hazard Mitigation Branch  
Subrecipient File





**CALIFORNIA EMERGENCY MANAGEMENT AGENCY  
LOCAL ASSISTANCE MONITORING BRANCH  
3650 SCHRIEVER AVENUE  
MATHER, CALIFORNIA 95655  
PHONE: (916) 845-8120 FAX: (916) 845-8380**

April 6, 2009

Sandy Covall-Alves  
Emergency Services Coordinator  
Sonoma County  
2300 County Center Drive, Suite 221A  
Santa Rosa, California 95403-4107

SUBJECT: GRANT MONITORING REPORT  
GRANT: FEMA-1155, OES PROJECT #0055, FIPS #097-00000  
PHASED ELEVATION PROJECT

Dear Ms. Covall-Alves:

The California Emergency Management Agency (CalEMA) (formerly the Governor's Office of Emergency Services (OES)) conducted a compliance field review on February 18 - 19, 2009 for the referenced grant. The purpose of the review was to determine if your organization complied with applicable laws, regulations, guidelines and policies.

The above grant was reviewed for compliance with the administrative and fiscal requirements as outlined in the Office of Management and Budget Circulars (OMB) and the Code of Federal Regulations (CFR). Our scope included reviewing fiscal and accounting records for the grant, and specifically, the Request for Reimbursement #13 for the period December 1, 2004 through June 1, 2008 and its supporting documentation. CalEMA met with the staff of the Sonoma County Community Development Commission (CDC), the organization administering this grant, and examined its procurement policy and subcontract records, including elevation certificates, deed restrictions, inspection reports, summary of costs per house and management fees. In general, the CalEMA monitors were pleased with CDC's documentation and record keeping for this grant.

Executive Summary:

Grant Type:	Hazard Mitigation Grant Program, FEMA-1155-0055-0004
Review Type:	Compliance Field Review
Scope:	Fiscal and Administrative
Review Period(s):	December 1, 2004 – June 1, 2008

Findings Summary:

1. Subrecipient is not following federal regulations regarding the calculation and reimbursement of eligible program costs.
2. Subrecipient is not reporting interest earned and payable to grant funding source.

Following are the detailed Findings resulting from the Compliance Field Review. Findings are discoveries that, within the context of a review process, represent operational deficiencies or errors, material program weaknesses or unacceptable program liabilities that could result in questioned grant costs, or collectively characterize a significant risk to program integrity.

## **FINDINGS**

### **Requirement:**

44 CFR, Part C, Section 13.20 describes the methods of payment to grantees. Section 13.20(b)(1) states, "*Financial reporting. Accurate, current and complete disclosure of the financial results of financially assisted activities must be made in accordance with the financial reporting requirements of the grant or subgrant.*" 44 CFR Section 13.21(d) states, "*...Reimbursement shall be the preferred method when the requirements in paragraph (c) of this section are not met...*". 44 CFR Section 206.205 further outlines the process for payment of claims for large projects and the FEMA Public Assistance Policy Digest (FEMA 322 - Payment of Claims) states, "*...the State makes payments to the applicant on the basis of actual incurred costs as the project proceeds.*"

### **Finding #1: Subrecipient is not following federal regulations regarding the calculation and reimbursement of eligible program costs.**

In examining documentation supporting the June 16, 2008 Request for Reimbursement in the amount of \$400,000 covering the period December 1, 2004 through June 1, 2008, it was determined that only the first three phases of the four phases for each house had actually been paid. The payment of this Request for Reimbursement resulted in a \$35,197.50 "advance" to CDC. It was also determined that a similar error had been made with the prior Request for Reimbursement covering the period December 1, 2004 through June 1, 2007.

In addition to the above, documentation provided in support of eligible costs for each house was based on original estimates which included the Construction Contract, a Construction Contingency amount (10% of construction), recording and permit fees, and Project Management fees for CDC (15% of Direct delivery Costs). FEMA's cost share for each project was capped and billed at \$75,000. This resulted in an over reimbursement on projects where unused contingency fees were returned to the home owner. This occurred in 3 of the 4 houses where project costs were examined. The return of contingency funds resulted in a reduction of the total eligible project costs of each house, which in turn affected both the calculation of FEMA eligible costs and the percentage of match (non-FEMA funds) required. This practice resulted in a \$10,987 overpayment on the four projects examined.



**Required Corrective Action:**

Please submit a Corrective Action Plan (CAP), which describes how all prior requests for reimbursement (including all current and prior cost analysis worksheets) will be reconciled to actual expenditures, and how any excess cash received and/or earned on the advance of funds will be tracked and returned to CalEMA/FEMA prior to project closeout.

**Requirement:**

44 CFR Sec.13.20 (b)(7), states, "*Cash management. Procedures for minimizing the time elapsing between the transfer of funds from the U.S. Treasury and disbursement by grantees and subgrantees must be followed whenever advance payment procedures are used.*" Section 13.21 (f)(1), states, "*Grantees and subgrantees shall disburse repayments to and interest earned on a revolving fund before requesting additional cash payments for the same activity*"

**Finding #2: Subrecipient is not reporting interest earned and payable to grant funding source.**

A review of the Management Letter issued for the 2007 A-133 Audit indicated CDC is recognizing interest payable to various funding sources for cumulative interest earned on cash advanced by funding sources since the inception of the respective programs. The CDC Controller confirmed that the organization has tracked approximately \$91,000 in interest earned on grant funds, and noted this amount is currently on deposit pending return to CalEMA/FEMA.

As a result of the interest earned on the advances described in Finding #1, Sonoma County CDC has accumulated excessive cash on hand which has generated over \$91,000 in interest earned on project funds.

**Required Corrective Action:**

Please submit a CAP, which describes by when and how all interest earned will be audited and returned to CalEMA/FEMA.

**ADVISORY RECOMMENDATION(S)**

Following are additional Observations and Advisory Recommendations resulting from the compliance review:

- Per the *Single Audit Act* and *Office of Management and Budget (OMB) Circular A-133, Audits of State, Local Governments, and Non-Profit Organizations*, non-federal entities that expend equal to or in excess of \$500,000 in a fiscal year in federal awards are required to have an audit performed in accordance with the Single Audit Act. The CDC did have a copy of their current A-133 audit on file; however, a copy had not been forwarded to the State Controller's Office as required. In the future, please ensure that all A-133 Audits are

Ms. Sandy Covall-Alves  
April 6, 2009  
Page 4

forwarded to the State Controller's Office within nine months of the end of the reporting period.

- Both the grant award agreement and subaward agreements with the homeowners included a requirement that funds for the relocation of tenants be obtained from the homeowners and held in an escrow account. This requirement was not practiced. CalEMA recommends that the subrecipient either remove the requirement from future grant award agreements, or follows all requirements as outlined for any future flood elevation mitigation projects.

If the subrecipient desires to either challenge or disagree with any of the referenced Findings or Advisory Recommendations included in this report, the subrecipient must respond with their written comments to CalEMA, along with inclusive supporting documentation, to the address shown on the CalEMA letterhead, attention Local Assistance Monitoring Branch.

Since there are significant Findings included in this report, formal corrective action is required to ensure all issues are addressed in a timely manner. The attached document, "Subrecipient Corrective Action Procedures" provides detailed instructions for developing the CAP. This CAP should be submitted to CalEMA within 30 days from the date of this letter. You are encouraged to work with your assigned Program Manager, Jorge Hunt, to develop your CAP.

Thank you for the courtesy and cooperation you extended CalEMA in completing this review. If you have any questions about this letter or the enclosures, please contact Don MacMillan at (916) 845-8107, or [don.macmillan@calema.ca.gov](mailto:don.macmillan@calema.ca.gov).

Sincerely,



MICHAEL BALDWIN  
BRANCH CHIEF

Enclosure

cc: Kathleen Kane, Executive Director  
Sonoma County Community Development Commission  
Gary Tabbert, Project Coordinator,  
Sonoma County Community Development Commission  
Peggy Okabayashi, CalEMA Assistant Secretary  
Paul Ransom, CalEMA Hazard Mitigation Branch  
Jorge Hunt, CalEMA Hazard Mitigation Branch  
Subrecipient File



## Subrecipient Corrective Action Procedures

All grants administered by the California Emergency Management Agency (CalEMA) are subject to the many requirements found in federal and state laws, federal regulations (e.g., *Code of Federal Regulations*), federal requirements (e.g., *Office of Management and Budget Circulars*) and state policy guidance. Recipients of these grant funds (referred to as Subrecipients) are also subject to periodic reviews in the forms of audits and monitoring to assure compliance with all applicable requirements. Such reviews often result in the identification of "Findings of Non-Compliance."

"Findings of Non-Compliance" may originate from several different types of reviews, including audits (Office of Management and Budget Circular A-133 or grant-specific), desk compliance reviews and field compliance reviews. Findings are defined as discoveries that, within the context of any review process, represent operational deficiencies or errors, material program weaknesses or unacceptable program liabilities that would probably result in questioned grant costs or, collectively characterize a significant risk to program integrity.

This document provides instructions to Subrecipients (S/R) regarding CalEMA's requirements for corrective action(s) relative to review "Findings." Whenever a Finding is issued against a grant, the Subrecipient is required to formally respond and demonstrate either the S/R's completed or proposed corrective actions. In simple terms, corrective action identifies the "who did what to address the issue?" referenced in the Finding, and "when was it done, or when will it be completed?"

By answering such questions, the S/R develops a Corrective Action Plan (CAP) that provides detailed information for the activities either completed or planned to address the issue(s) referenced in the Finding. In order to expedite this response process, CalEMA has developed a sample plan format with detailed instructions.

For Non-Compliance Findings that have not been resolved, laws and regulations permit the CalEMA and the S/R to enter into a formal compliance agreement that is represented by the S/R's Corrective Action Plan (CAP). An approved CAP allows the CalEMA to suspend enforcement actions for up to 180 calendar days, pending resolution of outstanding Findings. The CalEMA is obligated to resume enforcement actions if a S/R does not resolve the Non-Compliance Findings before the end of the CAP.

In order to determine if the S/R's Corrective Action Plan is sufficient, the CAP must:

- Identify the original Finding(s) of Non-Compliance, including specific identifiers listed in the report (e.g., Finding #1) and the terms of non-compliance.
- Identify the S/R staff responsible for corrective action, including title and complete contact information.
- Describe the specific corrective action taken (or to be taken) for each Finding.
- Show the planned completion date for each major activity.
- Include documentary evidence to verify compliance of Findings that have been resolved.
- Include the signature of an authorized agent of the S/R.

When the CAP is received, CalEMA staff will determine whether the Plan reasonably and sufficiently addresses the Non-Compliance Findings. The CalEMA will notify the S/R if the CAP is approved, or, if further information or documentation is required.

For each Finding where the S/R has proposed planned activities, the CAP must be re-submitted before the ending date (180 days), indicating that planned activities have been completed with a certification that the S/R became compliant, along with the applicable date(s) and documentary evidence to verify compliance.

Please submit the original CAP to:

California Emergency Management Agency  
Local Assistance Monitoring Branch  
3650 Schriever Avenue  
Mather, CA 95655

Please also submit a copy of the CAP to your assigned Program Specialist Linda Ortiz. The S/R is encouraged to consult with their assigned Specialist to develop their CAP.

For electronic submittals, this information may also be e-mailed to [don.macmillan@oes.ca.gov](mailto:don.macmillan@oes.ca.gov).



## Subrecipient Corrective Action Plan

Submit an original and one copy of a “**Subrecipient Corrective Action Plan**” to the California Emergency Management Agency (CalEMA) by no later than 30 days following the monitoring report date based on the Compliance Field Review Report issued by the CalEMA Local Assistance Monitoring Branch, for the following grant(s):

Subrecipient:	Sonoma County
Grant: FEMA-1155	Review Period: December 1, 2004 – June 1, 2008
OES PROJECT #0055	PHASED ELEVATION PROJECT
FIPS #097-00000	

For each review Finding, please provide the following information:

<b>Finding:</b> <i>(please include any identifiers included in the report, along with citations as appropriate)</i>	
<b>Contact Name &amp; Title:</b> <i>(this is the person(s) responsible for completing resolved or planned corrective action)</i>	<b>Contact Information:</b> <i>(please provide phone number and e-mail address for each contact)</i>
<b>Corrective Action(s):</b> <i>(include specific objectives and activities completed or planned to address the Finding, with actual or estimated dates)</i>	
<b>Objective or Activity:</b>	<b>Date:</b>

**Required Signature:** The S/R authorized agent certifies that all corrective action(s) have been, or will be, implemented as specified:

\_\_\_\_\_  
Signature of Authorized Agent

\_\_\_\_\_  
Date

\_\_\_\_\_  
Telephone

\_\_\_\_\_  
Name and Title of Authorized Agent